

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Zofia Lukawski,  
Plaintiff

v.

Client Services, Inc.,  
Defendant

Docket 3:12-cv-02082

(JUDGE WILLIAM J. NEALON)

FILED ELECTRONICALLY

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**PLAINTIFF'S PETITION FOR AN AWARD OF ATTORNEY'S FEES  
AND COSTS PURSUANT TO 15 U.S.C. § 1692K**

Plaintiff, pursuant to 15 U.S.C. § [1692k](#)(a)(3) and this Court's Order of August 29, 2013, requests an award of fees and costs of \$20,945.66. This figure represents the amount of \$23,272.96 from the itemized fee statement attached to the declaration of [Carlo Sabatini](#), less a discount of 10%.

Additionally, it is estimated pursuant to Fed.R.Civ.P. 54(d)(2)(B)(iii) that an additional 10 – 30 hours of time will be spent responding to Defendant's Reply to this petition. Plaintiff also requests that this time be compensated after a supplemental statement is filed.

This motion should be granted for the reasons set forth in the contemporaneously filed brief and declarations of [Carlo Sabatini](#), [Patrick Walsh](#), [William Schwab](#), [Jason Rapa](#), [Joseph Goldberg](#), and [Gary Milazzo](#). These declarations are incorporated herein by reference.

s/ Carlo Sabatini

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Carlo Sabatini  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000  
Facsimile (570) 504-2769  
Email: [ecf@bankruptcypa.com](mailto:ecf@bankruptcypa.com)  
Bar Number: PA 83831

**CERTIFICATIONS OF SERVICE AND NON-CONCURRENCE**

The within document is being served upon counsel for the defendant through the CM/ECF system. Defendant does not concur with the relief requested.

s/ Carlo Sabatini  
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Carlo Sabatini  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000  
Facsimile (570) 504-2769  
Email: [ecf@bankruptcypa.com](mailto:ecf@bankruptcypa.com)  
Bar Number: PA 83831